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Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re) Case No. 17-02914--LA13
WEI CHUN LEE,) Chapter: 13
Debtor.)
) DEBTOR'S STATEMENT OF
) CASE STATUS
)
) Hearing Date: 07/26/2018
) Hearing Time: 10:00 a.m.
) Dept 2 - Hon. Louise DeCarl Adler

Debtor herein, Wei Chun Lee (“Debtor”), through her counsel herein, hereby submits this Statement of Case Status as follows:

1. This matter was continued for the Debtor to obtain an evidentiary declaration from the United States Post Office (“USPS”) located at 1401 W Fort St. RM M129, Detroit MI 48233-1005, as it relates to the handling of mail (creditor’s) wherein a signature is required of the recipient.
2. Debtor’s Counsel is still in the process of speaking to Deion Smith, the carrier at the USPS location assigned to handle the mail routed to creditor’s address, having placed several calls to the USPS location at 1401 W Fort St. RM M129, Detroit MI 48233-1005 (800-275-8777 and 313-963-5758).
3. It should be noted that when calling the toll free number for this post office, there is an option to be routed directly to the carrier after entering the tracking number in question. When entering Certified Mail Number 701326300000153479298, the number for the Debtor’s mail

1 item containing her May, 2018 ongoing mortgage payment to creditor, the automated system is
2 still reporting the item “in transit.” Counsel for Debtor has placed at least three phone calls to
3 this number resulting in an automated disclosed hold time ranging from 45 minutes to 50
4 minutes, however each call becomes automatically disconnected after 55 minutes.

5 Debtor’s counsel has prepared a declaration for USPS employee Deion Smith to complete, and
6 is still in the process of obtaining the declaration once it has been completed. Debtor’s Counsel
7 anticipates, however, that there may be bright line rules preventing the local carrier from
8 completing the declaration absent court order or other administrative authority. Counsel is
9 investigating.

10 Debtor’s counsel has prepared a Subpoena for Deion Smith’s telephonic testimony as the carrier
11 at the USPS responsible for Creditor’s mail but has not served the subpoena as of the date of
12 this case status report.

13 Debtor’s Counsel anticipates it may take 2 weeks to effect personal service of the Subpoena and
14 that an additional 21 day notice should be given to the recipient before requiring the individual
15 to telephonically appear before the court.

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19
20 Respectfully submitted,

21 Doan Law Office

22 By: /s/ Shawn A Doan
23 Shawn A Doan
24 Attorneys for Debtor

Certificate of Service

On 7/19/2018, I served the foregoing

Statement of Case Status

on the following individuals by electronic means through the Court's NEF program:
Shawn A. Doan on behalf of Debtor Wei Chun Lee:

Michelle Ghidotti on behalf of Creditor Charles Schwab Bank
ecfnotifications@ghidottilaw.com, ECFNotifications@ghidottilaw.com

Michelle Ghidotti on behalf of Creditor Charles Schwab Bank, N.A.
ecfnotifications@ghidottilaw.com, ECFNotifications@ghidottilaw.com

Jamie D Hanawalt on behalf of Creditor Rushmore Loan Management Services, LLC
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David L. Skelton
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United States Trustee
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Jennifer C. Wong on behalf of Creditor JPMorgan Chase Bank, N.A.
bknotice@mccarthyholthus.com, iwong@ecf.courtdrive.com

Jennifer C. Wong on behalf of Creditor Towd Point Mortgage Trust 2017-4, U.S. Bank National Association, as Indenture Trustee

bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

Jennifer C. Wong on behalf of Creditor U.S. Bank Trust National Association
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 7/19/2018

/s/ Shawn A Doan

Shawn A Doan